

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>LEIGHTON RECARDO CHUNNU,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a “Dwayne Watts,”</b>	<b>:</b>	<b>18 U.S.C. § 911 (false representation of</b>
	<b>:</b>	<b>United States citizenship - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 922(g)(5)(A) (possession of</b>
	<b>:</b>	<b>firearm by illegal alien - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1001 (false statement - 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028(a)(4) (possession of false</b>
	<b>:</b>	<b>identification document - 1 count)</b>

---

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about January 5, 2005, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**LEIGHTON RECARDO CHUNNU,**  
**a/k/a “Dwayne Watts,”**

an alien and a native and citizen of Jamaica, falsely and willfully represented himself to be a  
citizen of the United States.

In violation of Title 18, United States Code, Section 911.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 5, 2005, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**LEIGHTON RECARDO CHUNNU,  
a/k/a “Dwayne Watts,”**

while being an alien illegally and unlawfully in the United States, knowingly possessed in and  
affecting interstate commerce a firearm and ammunition, that is a 9mm INTEC handgun, loaded  
with eleven (11) rounds and twenty-five (25) live rounds in his pocket.

In violation of Title 18, United States Code, Section 922(g)(5)(A).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 5, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LEIGHTON RECARDO CHUNNU,  
a/k/a “Dwayne Watts,”**

in a matter within the jurisdiction of the U.S. Immigration and Customs Enforcement, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant LEIGHTON RECARDO CHUNNU represented that his true name was Dwayne Watts and that he was a citizen of the United States, in a sworn statement, Form I-215B, and provided to the Immigration and Customs Enforcement, when as defendant well knew, his true name is Leighton Recardo Chunnu and his true place of birth and nationality is Kingston, Jamaica.

In violation of Title 18, United States Code, Section 1001.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 5, 2005, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**LEIGHTON RECARDO CHUNNU,  
a/k/a “Dwayne Watts,”**

knowingly possessed a false identification document, that is, a driver’s license from the United  
States Virgin Islands, in the name of Dwayne Watts, with the intent such document be used to  
defraud the United States.

In violation of Title 18, United States Code, Section 1028(a)(4).

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**